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November 5, 2021

**VIA ECF**

Hon. Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**MEMO ENDORSED**

Re: G.P., et al. v. New York City Dep't of Educ.  
Docket No. 21-CV-6511 (KPF)

Dear Judge Failla:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel, attorney for the New York City Department of Education ("DOE") in the above-referenced action. Pursuant to Rule 2.D of the Court's Individual Rules of Practice in Civil Cases, I write to respectfully request an extension of time for DOE to answer or otherwise respond to the Complaint, as well as a corresponding adjournment of the initial conference in this matter.

In their Complaint (ECF No. 3), Plaintiffs seek review of an administrative decision of a State Review Officer ("SRO"), pursuant to the Individuals with Disabilities Education Act ("IDEA"). I write now to respectfully request an extension of two weeks, to November 16, 2021, for DOE to respond to the Complaint. I also respectfully request a corresponding adjournment of the initial conference, from November 10, 2021 to November 23, 2021 (or a time thereafter that is convenient for the Court). I sincerely apologize for the timing of this request. I was not aware that this case was assigned to me while I was away on vacation, and additional time is therefore needed to investigate the allegations in the Complaint and prepare an appropriate response.

This is Defendants' first such request. I have conferred with Plaintiffs' counsel, Marion Walsh, Esq., who does not have Plaintiffs' authorization to consent this request, and cannot agree to Defendant's request at this time.

I thank you for your consideration of this matter.

Respectfully submitted,

/s/

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Copatrck Thomas  
Assistant Corporation Counsel

cc: All Attorneys of Record  
(via ECF)

Application GRANTED.

Defendant shall file its response to the Complaint on or before **November 16, 2021**. Additionally, the initial pretrial conference in this matter is ADJOURNED to **November 30, 2021, at 11:00 a.m.**

The Clerk of Court is directed to terminate the motion at docket entry 10.

SO ORDERED.

Dated: November 8, 2021  
New York, New York

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE